MEMORANDUM

Date: August 28, 1987

To: Administrative Record

From: Steven Gobelman 🌮

Subject: Cabot Corporation's 39h

Cabot Corporation owns and operates two injection wells for the purpose of disposing of their liquid hazardous waste. The waste streams are hazardous for corposivity only, mainly hydrochloric acid. Cabot has determined that it is technically feasible to reutralize the waste and render it non-hazardous. However, Cabot has stated that, "neutralization would not be economically reasonable and would be environmentally unsound".

The cost for reutralization the waste and the current operating cost is indicated below.

Total waste injection (1986) = 68,603,083 gallons

cost of operation per year = \$35,000
cost to neutralize with lime = \$267,500/year
cost to neutralize with aqueous ammonia = \$427,600/year

Therefore the cost per gallon are as follows

cost now = 35,000/6.8E7 = 0.05 cents/gallon cost to neutralize with lime = 267,500+35000/6.8E7 = 0.44 cents/gallon cost to neutralize with aqueous ammonia = 427600+35000/6.8E7 = 0.68 cents/gallon

it will cost 9 times as much to neutralize with lime and it will cost 12 times as much to neutralize with aqueous ammonia

The Agency agrees with Cabot Corporation at this time and approves the 39h on the ground that it is economically unreasonable. Conditions in the permit will limit the percentage and temperature of the acid to a point the Agency feel will protect the environment and human health.

